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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

MAY 24 2019

AT GREENBELT
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

CRIMINAL NO.

ARINZE MICHAEL OZOR,

Defendant

19-1844 TJS

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT

I, David Snuffer, Special Agent of the Diplomatic Security Service, United States Department of State ("DSS"), being duly sworn, hereby declare as follows:

1. I make this affidavit in support of a criminal complaint and arrest warrant for **ARINZE MICHAEL OZOR** (hereinafter "**OZOR**"), who has also used the aliases **KELVIN CRAIG GREEN** ("**GREEN**") and **JACOB HESSOU** ("**HESSOU**"), for violation of Title 18, United States Code, Sections 1543 (Forgery or false use of passport) and 1014 (False statements to a bank). As described below, there is probable cause to believe that **OZOR**, within the District of Maryland and elsewhere, has knowingly and willfully forged or used a false or forged passport, or instrument purporting to be a passport, as proof of his identity to facilitate opening accounts at financial institutions. Further, there is probable cause to believe that **OZOR**, within the District of Maryland and elsewhere, has knowingly made false statements for the purpose of influencing in any way the action of an institution, the accounts of which are insured by the Federal Deposit Insurance Corporation ("FDIC").

2. I have been a Special Agent with DSS since March 2014, and I am currently assigned to the Washington Field Office as a criminal investigator. As a federal agent, I am

authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States. I have received training in law enforcement and criminal law from the Federal Law Enforcement Training Center in Glynco, Georgia, and I have attended the DSS Basic Special Agent Course in Dunn Loring, Virginia. While at the Washington Field Office, I have gained knowledge and experience through participating in numerous investigations and continuing education opportunities.

3. This affidavit is based upon information that I have obtained from my personal observations, witness interviews, review of documentary evidence, information provided to me by other members of the investigation, and my training and experience. Because this affidavit is being submitted only for the limited purpose of establishing probable cause for the proposed criminal complaint and arrest warrant, it does not include all information known to the government as a result of the investigation.

APPLICABLE STATUTES

4. Title 18, United States Code, Section 1543 makes it a crime to “willfully and knowingly use[], or attempt[] to use, or furnish[] to another for use any [] false, forged, counterfeited, mutilated, or altered passport or instrument purporting to be a passport”

5. Title 18, United States Code, Section 1014 makes it a crime to “knowingly make[] any false statement . . . for the purpose of influencing in any way the action of . . . any institution the accounts of which are insured by the [FDIC].”

FACTS SUPPORTING PROBABLE CAUSE

6. **OZOR** is a native of Nigeria, who made lawful entry into the United States in 2008, having obtained a Diversity Immigrant Visa. In 2015, **OZOR** became a naturalized United States

Citizen. **OZOR** was issued a U.S. passport in September 2015, and has also traveled on a Nigerian passport, including on or about May 11, 2017.

ACCOUNTS IN THE NAME GREEN

7. On or about January 5, 2018, an individual assuming the name GREEN, later identified as **OZOR**, opened a BB&T Bank Account ending in 5604 ("BB&T 5604 Account"), having presented and used a purported Ghanaian passport, #G1698732. That passport was in the name of GREEN, but contained a photograph that law enforcement has identified as **OZOR**, as further described below.

8. On or about January 25, 2018, a fraud investigator at BB&T informed me about the BB&T 5604 Account. BB&T is insured by the FDIC. The investigator also notified me that the account had been frozen due to suspicion of fraudulent activity. Further, the fraud investigator told me that the account holder would be attempting to meet with a banker later that day to discuss obtaining access to his frozen account(s). The investigator provided me with a surveillance photograph of the account holder (below), whom law enforcement has identified as **OZOR**:



9. On or about January 25, 2018, I conducted surveillance at the relevant BB&T branch in Hyattsville, Maryland, along with a second DSS Special Agent. I saw an individual

resembling the surveillance photograph walk into the bank and meet with a banker. Once the meeting ended, the individual walked out of the bank, and the banker informed me that this was the purported GREEN and that he had presented her with the same Ghanaian passport #G1698732 for examination. Meanwhile, the second DSS Special Agent followed the individual to a black Toyota Camry with the Maryland vehicle tag 3BP4547.

10. Records checks revealed that this vehicle was registered at that time to **OZOR**, who also held a Maryland Driver's License. U.S. State Department Records show that a copy of this same driver's license was submitted along with **OZOR**'s Application for a U.S. Passport Form DS-11 in 2015.

11. A comparison between the photographs on the Ghanaian passport #G1698732 (in the identity of GREEN) and **OZOR**'s driver's license and other images of **OZOR** that I have seen make me believe that **OZOR** was the individual who opened the account using a false name and passport. The GREEN passport photograph and **OZOR**'s driver's license photograph are shown here:



12. Further investigation has revealed that the same Ghanaian passport #G1698732 was used to open bank accounts in the GREEN identity at SunTrust Bank, Bank of America, and Wells Fargo on three different dates in January 2018. For instance, law enforcement has identified that on or about January 10, 2018, **OZOR** opened SunTrust Bank account ending in 6113 ("SunTrust 6113 Account") using Ghanaian passport #G1698732 in the name GREEN. Surveillance footage

shows **OZOR** in a SunTrust branch in Chevy Chase, Maryland, making an opening deposit into the SunTrust 6113 Account on or about that same date (below):



ACCOUNTS IN THE NAME HESSOU

13. On or about May 3, 2018, I received a notice that **OZOR**'s vehicle tag (Maryland license plate 3BP4547) had been scanned by a License Plate Reader ("LPR") at a location near the intersection of 4th Street and 94th Avenue in Lanham, Maryland. Upon review of this location, I saw that two banks were within close walking distance and I suspected that **OZOR** might have been conducting transactions at either or both banks.

14. On or about that same date, I showed photographs of **OZOR** to the bank manager at the Bank of America branch located nearby. Bank of America is insured by the FDIC. The bank manager said that she recognized the individual depicted in those photographs (**OZOR**) as a frequent customer who had opened an account using the HESSOU identity and presented purported Benin passport #B0395761, bearing the HESSOU name. Review of records showed that **OZOR** had opened an account ending in 8941 at that Bank of America location on or about March 23, 2018.

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15. Further investigation has revealed that the same Benin passport #B0395761 was used to open bank accounts in the HESSOU identity at Capital One and Wells Fargo in April 2018 and May 2018, respectively.

FALSE OR FORGED PASSPORTS

16. Based on my investigation, it is apparent that the passports **OZOR** has used to open these bank accounts are not legally issued to him. First, a thorough examination of the available documentation establishes his identity as **ARINZE MICHAEL OZOR**, a native of Nigeria, naturalized as a United States Citizen, as described above. He is not known to have held Ghanaian or Beninian citizenship, nor to hold passports in either nationality.

17. Further, inquiries to the U.S. Embassy in Accra, Ghana, resulted in official communication to the Ghana Ministry of Foreign Affairs and Regional Integration, which in return provided the U.S. Embassy with documentation stating that the number (G1698732) used on the purported Ghanaian passport for GREEN was in actuality issued to a different individual, and not to GREEN.

18. Similarly, inquiries to the U.S. Embassy in Cotonou, Benin, resulted in official communication to the Benin Ministry of the Interior and of Public Security, which in return provided the U.S. Embassy with documentation stating that the purported Benin passport #B0395761 is not authentic. That passport number was in actuality issued to a different individual, and not to HESSOU. In addition, the individual believed to hold the true HESSOU identity was born in a different year than is shown on the passport.

19. Based on my training and experience, I understand that the actual identity of the customer opening a bank account is material to banks' decisions on whether or not to allow the opening of accounts.

CONCLUSION

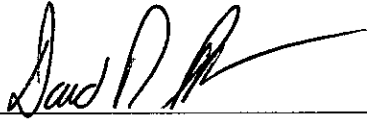
20. Based on the foregoing information, I respectfully submit that there is probable cause to believe that on or about the following dates outlined in the Counts below, in the District of Maryland and elsewhere, **ARINZE MICHAEL OZOR** did knowingly and willfully forge or use a false or forged passport, or instrument purporting to be a passport, as proof of his identity to facilitate opening accounts at financial institutions, and did knowingly make false statements for the purpose of influencing in any way the action of an FDIC-insured institution, in violation of Title 18, United States Code, Sections 1543 and 1014:

- Count 1: On or about January 5, 2018, **OZOR** violated 18 U.S.C. § 1543 when **OZOR** opened an account at BB&T in the name of GREEN with Ghanaian passport, #G1698732.
- Count 2: On or about January 5, 2018, **OZOR** violated 18 U.S.C. § 1014 when **OZOR** opened an account at BB&T in the name of GREEN with Ghanaian passport, #G1698732.
- Count 3: On or about March 23, 2018, **OZOR** violated 18 U.S.C. § 1543 when **OZOR** opened an account at Bank of America in the name of HESSOU with Benin passport #B0395761.

(cont'd)

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- Count 4: On or about March 23, 2018, **OZOR** violated 18 U.S.C. § 1014 when **OZOR** opened an account at Bank of America in the name of HESSOU with Benin passport #B0395761.



David R. Snuffer
Special Agent
United States Department of State
Diplomatic Security Service

Subscribed and sworn to before me on this 23 day of May, 2019.



Hon. Timothy J. Sullivan
United States Magistrate Judge